

1 wasn't the easiest situation in the world to get an up and  
2 coming program director to come into a situation that we  
3 were faced with. So he felt like the guy had a lot of  
4 experience and could put a lot of enthusiasm in to do the  
5 job.

6 Q Did Mike Rice have any involvement in recruiting  
7 or finding Mark Savage?

8 A No.

9 Q Now, Mark Savage was eventually terminated?

10 A That's correct.

11 Q Did Mike Rice direct you to fire Savage?

12 A No.

13 Q Did Mike Rice ever tell you he wanted Savage  
14 fired?

15 A No.

16 Q Did Paul Hanks ever tell you that Mike Ride wanted  
17 Savage fired?

18 A No.

19 I think Paul Hanks wanted him fired.

20 Q Did Paul Hanks ever complain to you about Savage?

21 A Yes.

22 Q And in what respect?

23 A He was difficult to get along with. In my  
24 opinion, I believe that Chris felt that Mark Savage was a  
25 threat to him. I have believed for a long time that Chris

1 always felt like that anybody who was maybe more talented  
2 than he was, that this was a threat to him. He never wanted  
3 to have anybody who was a better talent than he was.

4 Q Well, let me ask you this.

5 Why was Mark Savage terminated?

6 A Well, there was multiple things. One was we were  
7 having problems with the following of the format. He had  
8 some personal problems. And those personal problems kept  
9 him from booking the hours that it takes to be a program  
10 director.

11 Everybody in this industry knows there is no such  
12 thing as a 40-hour work week for a program director. And --  
13 now, those were some of the main reason, plus the fact that  
14 because of some of the changes in the format, I was  
15 concerned that there was some improper things that were  
16 going on.

17 Q Were you ever aware -- now, you testified about  
18 Hank's complaints. Were you aware of aware of conflicts  
19 between Hanks and Savage?

20 A Yes, I think so, because he resented, Mark Savage  
21 resented Chris Kellogg's input because he felt like that he  
22 was really more qualified than what Chris was. He worked in  
23 larger markets. He worked with more consultants and things  
24 of that nature.

25 Q How do you know this?

1           A     Because they both had conveyed that to me, and  
2     John had talked about it.

3           JUDGE STEINBERG:   John?

4           THE WITNESS:   John Rhea.

5           BY MS. SADOWSKY:

6           Q     And it's true -- did Mr. Savage ever resign --

7           A     Yes.

8           Q     -- prior to his termination?

9           A     Yes, he did.

10          Q     And do you know what the reasons were for that  
11     resignation?

12          A     Well, he said that he -- the obligations that we  
13     expected from him were just more than, you know, he could  
14     do.

15          Q     And was Chris Kellogg a factor in --

16          A     Yes, he was.

17          MR. ZAUNER:   Objection.

18          JUDGE STEINBERG:   It's already been answered.   You  
19     can test him on cross.

20          BY MS. SADOWSKY:

21          Q     And Mr. Savage revoked that resignation?

22          A     Yes.

23          Q     Let's see, Chip Ramsey was the next employee in  
24     Terre Haute.

25                   What was his position?

1           A     He was the -- he originally was an announcer. He  
2     worked there for quite some time. He was an announcer, then  
3     he was the program director on the AM, and then he handled  
4     both promotions on the AM and the FM.

5           Q     Did Mike Rice direct you to fire Chip Ramsey?

6           A     No.

7           Q     Did Mike Rice ever suggest to you that Chip Ramsey  
8     should be fired?

9           A     No.

10           Mike did not like Chip Ramsey, but he never  
11     directed for him to be fired.

12           Q     Who fired Chip Ramsey?

13           A     John Rhea.

14           Q     And who directed Chip Ramsey's firing?

15           A     I did.

16           Q     And why?

17           A     Because we were just -- there were too many things  
18     that were not happening. We make some changes in the format  
19     on WBOW that Chip was not happy about. And the -- so his  
20     attitude really reflected in his work.

21           Q     Did Mike Rice's dislike Chip Ramsey affect you to  
22     have him fired?

23           A     No.

24           Q     The next employee, Steve Holler.

25           A     Um-hmm.

1           Q     Mr. Rhea testified yesterday that when he hired  
2     holler he got your okay and it wasn't a problem.

3                     Is that true?

4           A     I guess it's a matter of interpretation. I don't  
5     think so.

6                     Steve Holler's mother, Margaret, worked at the  
7     radio station, and worked there for a long time. In fact,  
8     she worked until she retired. She was an excellent employee  
9     as the traffic manager and the office manager.

10                    Probably two - three, I don't know how many  
11     occasions when I had been in town Margaret had said  
12     something to me about her son wanting to first get into  
13     broadcasting, and then later on she said he was working at  
14     the radio station.

15                    And I said to her, "Well, you know, you talk to  
16     John about it," because that was my way of passing the buck  
17     per se and not wanting to hire him. One of the reasons  
18     being that we always felt that if you had -- if there was a  
19     problem with one person in a family, that you might lose the  
20     other employee.

21                    I know I make exceptions to the rule because two  
22     of my children work for the company, but that was a little  
23     bit different than some of these other situations.

24                    But we didn't think that -- I told him from that  
25     standpoint, "What if it doesn't work out? What are you

1 going to do if it causes problems and hard feelings with  
2 Margaret?"

3 And he said, "I'll take care of it."

4 But I don't think that John was the type of  
5 personality who could say to him, "No, I'm not going to hire  
6 you, I'm not going to hire you."

7 The last employee at WZZQ that I want to raise  
8 with you other than John Rhea, we will get to him, is Ben  
9 Jacobs.

10 Now, Ben Jacobs worked as a program director at  
11 Terre Haute for a period of time; is that correct?

12 A Right. I think he was there about a year.

13 Q Now, who fired Ben Jacobs?

14 A Ken Brown.

15 Q And did Mike Rice ever tell you that Jacobs had to  
16 go?

17 A No.

18 Q To your knowledge, did Mike Rice direct Ken Brown  
19 to fire Jacobs?

20 A No.

21 Q Do you know why he was fired?

22 A Do I know what?

23 Q Why Jacobs was fired.

24 A Because Ken said that the job was just  
25 overwhelming. It was too much. He said, "Ben just wasn't,

1 just wasn't ready for all the responsibilities of a program  
2 director at that statement."

3 Q Now, with respect to John Rhea, Mr. Rhea testified  
4 yesterday that you did not tell him about Mike Rice's  
5 criminal indictment in the hiring process.

6 Is that true?

7 A No.

8 Q Did you tell Mr. Rhea about Mike Rice's criminal  
9 indictment?

10 A Yes, I did.

11 Q And he said that had he know, he said yesterday  
12 had he know he would not have taken the job. And you are  
13 now telling me that you did tell him.

14 A Yes, I did tell him.

15 Q Was there any further discussion concerning that  
16 point in the hiring process in respect to his -- did he  
17 voice any reservation about taking the job?

18 A No, in fact, he continued to pursue me for the  
19 position. John Rhea had just lost his job. He had had, I  
20 think, maybe three or four jobs in the last three years.  
21 And he was without a position and was going to move back to,  
22 I believe, Memphis with some of his wife's family, and was  
23 wanting very much to secure a position.

24 And, you know, it was one of those kind of things  
25 where it was difficult to find a manager due to the

1 circumstances. In fact, the individual that I would have  
2 liked to have hired, I couldn't afford. And John knew about  
3 it, and, as I said, he continued to call wanting the  
4 position.

5 Q Now, if I told you that he said --

6 A He hadn't even seen the facility when he accepted  
7 the position because we finalized -- I'm sorry. We  
8 finalized it, I met him in Terre Haute, and that's when we  
9 finalized it. That's when he signed his papers and he was  
10 actually supposed to start work for a week or two. And he  
11 said, "No, no, I want to start today."

12 Q He testified yesterday that he learned about Mike  
13 Rice's criminal indictment from the salesperson on the staff  
14 weeks after he joined the staff, and then later he raised it  
15 with you.

16 Is it your testimony here that his testimony  
17 yesterday was untrue?

18 A That is not -- that's not true. The individual  
19 he's talking about did quit. His name was Tom Warwick. He  
20 was a salesman. At the Christmas party that John Rhea  
21 attended when he was hired, Tom Warwick's wife told me that  
22 night that she did not want Tom to continue working here  
23 with circumstances of Mike Rice. They had just recently  
24 gotten married. He resigned and they moved back to Chicago.

25 I had told John Rhea when I hired him that this

1     could be a real possibility. You know, that you are going  
2     to have very likely be faced with situation that employees  
3     are going to resign for one reason or another. And it can  
4     be -- in fact, there can be 101 reasons why you don't buy  
5     advertising. I said there is going to be 101 reasons why  
6     people are going to resign. This gives you 102.

7           Q     I am going to turn your attention now to KFMZ.  
8     The employee there that I want you to direct your attention  
9     to is Sean Madden.

10          A     Um-hmm.

11          Q     Did Mike Rice ever criticize Sean Madden's talent  
12     to you?

13          A     No.

14          Q     Did he ever criticize Sean Madden's performance?

15          A     No.

16          Q     On air?

17          A     On-air performance, no.

18          Q     Did Paul Hanks ever make critical remarks  
19     regarding Sean Madden's performance to you?

20          A     Yes.

21          Q     And to your knowledge, did Hanks want to fire  
22     Madden?

23          A     Yes.

24          Q     And why was that?

25          A     Well, Sean Madden was, like a lot of announcers in

1 the broadcast industry, he had a very big ego. He was  
2 talented when he wanted to be. When he didn't want to be,  
3 he could be awful. And he - it reflected -- his attitude  
4 reflected it in there. I mean, one day he would be great.  
5 Maybe another day he didn't want to do something, he was bad  
6 at it. So therefore he became kind of difficult to control,  
7 I guess you can say, or manage.

8 When he was -- when he was good, he was very good.  
9 And as I have stated earlier, and as I firmly believe, I  
10 think from a talent standpoint Chris saw that as a threat to  
11 him.

12 MS. SADOWSKY: I think those are all the questions  
13 I have, Ms. Cox.

14 THE WITNESS: Okay.

15 JUDGE STEINBERG: Why don't we take a break and  
16 then -- if you want one, then you can huddle up.

17 MR. ZAUNER: Yes, Your Honor, I would.

18 JUDGE STEINBERG: Okay, 10 minutes?

19 MR. ZAUNER: Can we make it 15?

20 JUDGE STEINBERG: Okay. We will come back at  
21 about five to 12. Thank you.

22 (Whereupon, a recess was taken.)

23 JUDGE STEINBERG: Back on the record.

24 Mr. Zauner, cross-examination?

25 //

## 1                   SURREBUTTAL CROSS-EXAMINATION

2                   BY MR. ZAUNER:

3                   Q     Mrs. Cox, you indicated that you believe Paul  
4     Hanks and Mike Rice to be social friends; is that correct?

5                   A     That's correct.

6                   Q     And you indicated that, among other things, they  
7     went to each other's homes; is that correct?8                   A     Well, I know that Paul Hanks went to Mike Rice's  
9     home. I don't know of Mike Rice ever went to Paul Hanks'  
10    home or not.11                  Q     Do you know the reason that -- did you say that  
12    Paul Hanks went to Mike Rice's home?

13                  A     That's correct.

14                  Q     Do you know the reason?

15                  A     I guess any reason that you go to another friend's  
16    house. I don't know.

17                  Q     Could there have been a business reason?

18                  A     No, because Mike Rice believed that you don't mix  
19    business with pleasure, and you don't talk business in a  
20    bar.21                  Q     Well, if Mike Rice believed that you did not mix  
22    business with pleasure, and Paul Hanks is an employee of  
23    his, do you think that the purpose of the meeting was  
24    perhaps business?

25                  A     No.

1           You have got to understand Mike Rice a little bit  
2   from that standpoint, and that Mike Rice's life has been the  
3   radio industry, his entire life. He has brought enumerable  
4   individual into the industry, has trained them, and they  
5   have become very, very successful in this industry.

6           And I think that was the situation with Paul  
7   Hanks. He was an individual who was wanting to learn many  
8   aspects of the broadcast industry, and that was how the  
9   friendship developed. I think most all --

10          Q     Would it be fair to say about Mike Rice that he  
11   did not separate business and pleasure; that the radio  
12   business was his pleasure?

13          A     The radio was Mike Rice's life, yes. The  
14   broadcast industry is his life. I don't think there is any  
15   individual in the industry who is more dedicated to the  
16   broadcast industry than Mike Rice is.

17                JUDGE STEINBERG: Let's get back to the visit to  
18   the house.

19                Was it just once?

20                THE WITNESS: I don't know.

21                JUDGE STEINBERG: Okay, but you weren't there?

22                THE WITNESS: No.

23                JUDGE STEINBERG: So you don't know what they  
24   discussed?

25                THE WITNESS: No.

1 JUDGE STEINBERG: So you're speculating that it  
2 was social?

3 THE WITNESS: That's right, because I don't know.

4 BY MR. ZAUNER:

5 Q You also mentioned that they had telephone  
6 conversations; is that correct?

7 A Yes.

8 Q And some of these telephone conversations may have  
9 taken place, I think you said, after hours?

10 A That's right.

11 Q Do you know what was discussed in these telephone  
12 conversations after hours?

13 A No, not always.

14 Q Did these telephone conversations take place after  
15 April of '91?

16 A Yes.

17 Q You also indicated that they went to concerts  
18 together?

19 A Yes.

20 Q Was this a frequent occurrence?

21 A I don't know. I just know that they went to  
22 concerts together.

23 Q Do you know --

24 A I don't know what most of the personnel do after  
25 hours. I don't know, and I really don't care, as long as it

1 doesn't interfere with the performance of their job.

2 Q Do you know whether they went to more than one  
3 concert together?

4 A I don't know.

5 Q Do you know whether they went to any concerts  
6 together?

7 A Yes, I do know that they went to concerts  
8 together. Yes, I do know that. I don't know how many.

9 Q Now, you indicated that Paul Hanks worked at a  
10 station that I believe the call letter were KOQL; is that  
11 correct?

12 A Yes.

13 Q Isn't it a fact that the format of KOQL is an  
14 oldies format?

15 A Well, what is oldies?

16 Q I'm sorry, I missed that.

17 A What is oldies?

18 Q When they report to Radio & Record, if a station  
19 is following a play list, would they follow a different play  
20 list if they were an oldies station --

21 A There is not -- I'm sorry.

22 Q -- than if they were a rock station?

23 A There isn't a reporting for oldies.

24 Q Is there something that covers that kind of  
25 classification of recordings?

1           A     Well, it depends upon what kind of oldies you are  
2     playing. That's what I am saying.

3           Q     There are different classifications of oldies  
4     then?

5           A     Yes. And what is oldies --

6           Q     What are some of those classifications? Could you  
7     tell us?

8           A     Well, some people say sixties and seventies are  
9     oldies. Some people say thirties, forties and fifties.  
10    Some people say -- it depends upon what age you are looking  
11    at, and also it depends -- some people say easy listening is  
12    oldies, but that's not true because you may play some of the  
13    current hits.

14          Q     But KOQL, do you happen to know what kind of music  
15    that station plays and where that would fit in with the  
16    oldies category?

17          A     Well, in my opinion, KOQL plays music all over the  
18    place.

19          Q     Now, does KFMZ play music all over the place?

20          A     No, we play rock.

21          Q     Strictly rock?

22          A     Right.

23                 And that can cover a pretty wide demographic also.

24                 When you think about KOQL, their targeted  
25    demographics are the 18 to 34, the same as ours are.

1 JUDGE STEINBERG: So they might play different  
2 music but they are targeting the same people?

3 THE WITNESS: That's correct. In the same  
4 marketplace.

5 JUDGE STEINBERG: Different characterization  
6 music.

7 THE WITNESS: That's right. So you are sharing  
8 the same audience.

9 JUDGE STEINBERG: How much to 34?

10 THE WITNESS: Eighteen to 34.

11 JUDGE STEINBERG: Why would they be interested in  
12 oldies?

13 THE WITNESS: Well, what is oldies?

14 JUDGE STEINBERG: Well, there is classic rock,  
15 which is seventies and eighties, which I think is --

16 THE WITNESS: See, what's old to you or I may not  
17 be old to them.

18 JUDGE STEINBERG: Yeah, my oldies are not your  
19 oldies, and they are certain not Mr. Mastando's oldies.

20 THE WITNESS: Right.

21 JUDGE STEINBERG: Mr. Mastando's oldies are called  
22 classic rock, right?

23 MR. MASTANDO: Led Zeppelin, Your Honor.

24 JUDGE STEINBERG: Yeah, that's classic rock,  
25 right? It's also loud. And my oldies are early sixties.

1 THE WITNESS: That can be hard rock.

2 MR. ZAUNER: Okay, we beat that horse.

3 JUDGE STEINBERG: Well, we could talk about this  
4 all afternoon.

5 BY MR. ZAUNER:

6 Q Let me ask you, Mr. Hohlman, who was an announcer  
7 and PD at WZZQ; is that correct?

8 A That's correct.

9 Q And you say that he was replaced by a Mike Steel  
10 who you hired?

11 A That's correct.

12 Q Do you know whether Mike Rice had any  
13 conversations with anybody at WZZQ regarding the hiring of  
14 Mike Steel?

15 A I don't know.

16 Q And you wouldn't have any way of knowing that for  
17 sure; is that correct?

18 A That's correct.

19 Q Mike Rice never told you that he had discussed the  
20 hiring of anyone?

21 A No.

22 Q There was some testimony about Mike Steel having  
23 resigned from his job.

24 Was it a standard operating procedure at the  
25 companies to give an employee an opportunity to resign

1 before you fired him?

2 A No, because if they resign -- if you terminated  
3 them, you had to give them severance pay. If they resigned,  
4 which they normally would do if they had another position or  
5 if they just wanted out of there, there were differences as  
6 far as the circumstances were concerned.

7 But, no, it was not policy. You weren't given the  
8 choice, hey, do you want to resign or terminate because it  
9 looks better on their record. No. Because in the broadcast  
10 industry that doesn't make any difference. It all depends  
11 how many jobs you had in a fixed period of time.

12 Q Well, if somebody resigned, you also wouldn't have  
13 to pay into the state unemployment category.

14 A It depends on the state.

15 Q Okay.

16 JUDGE STEINBERG: Let's talk about Indiana and  
17 Missouri.

18 MR. ZAUNER: Yes.

19 BY MR. ZAUNER:

20 Q In Indiana and Missouri, did you have to pay into  
21 a funds to --

22 A Yes.

23 Q -- state unemployment compensation?

24 A Yes.

25 Q And was that fund predicated -- the amount you

1 paid predicated on the number of termination?

2 A Well, it doesn't make any difference because we  
3 are paying the maximum amount in both states.

4 Q Okay.

5 A So whether we fired one or 20 more, it didn't make  
6 any difference. We're paying the maximum amounts.

7 Q Do you know whether Paul Hanks was offered an  
8 opportunity to resign rather than be terminated?

9 A No. Paul Hanks, to my knowledge, Paul Hanks was  
10 offered the opportunity to take a medical leave and to get  
11 his health straightened out. He did not want to do that.  
12 And when he came back from vacation his work performance was  
13 worse, worse than it ever was before, and it was just not an  
14 acceptable situation.

15 Q Well, then let me ask my question again.

16 MR. ZAUNER: I request that that answer be  
17 stricken as nonresponsive, Your Honor.

18 My question was whether Paul Hanks was offered an  
19 opportunity to resign before he was fired.

20 JUDGE STEINBERG: And the answer is no.

21 BY MR. ZAUNER:

22 Q Is that the answer? I'm not sure if that's the  
23 answer.

24 A Well, I didn't offer him the opportunity to  
25 resign, no.

1 Q Do you know whether anybody else did?

2 A No, I don't -- Richard Hauschild -- Paul Hanks  
3 testified, I believe, in his hearing that Richard Hauschild  
4 gave him the opportunity to resign. I don't know if that's  
5 true or not. I was not present.

6 MR. ZAUNER: Your Honor, I renew my request that  
7 that previous answer be stricken as totally unresponsive to  
8 the question that was asked.

9 JUDGE STEINBERG: No, I will deny that request. I  
10 think that's in the record already anyway.

11 MR. ZAUNER: Well, that's why I am asking it to be  
12 stricken. If it wasn't in the record, there would be no  
13 need for the motion.

14 JUDGE STEINBERG: No, no, no. I mean from the  
15 last time --

16 MR. ZAUNER: From the last time.

17 JUDGE STEINBERG: -- she testified she talked  
18 about Mr. Hanks' job performance and health problems.

19 BY MR. ZAUNER:

20 Q With regard to Mr. Bianchi or Mr. Savage, I guess  
21 the same individual, you indicated that he had at one point  
22 offered a resignation to the company, and then revoked the  
23 resignation; is that correct?

24 A Yes.

25 Q When was it that he offered his resignation?

1           A     I have to see the date. I was trying to remember  
2 exactly when he worked there. He worked from April to  
3 November, i think. And I believe it was shortly after he  
4 came to work there that he offered the resignation because  
5 he resented Paul Hanks/Chris Kellogg, because there, again,  
6 he felt like that he was far more qualified than Chris was.

7                     And I think that the --

8           Q     No, my only question was when he offered his  
9 resignation.

10          A     I would say maybe six weeks, something like that.  
11 I don't know --

12          Q     Shortly after he began.

13          A     -- without seeing the letter. And I believe he  
14 rescinded it the very same day, if I remember correctly.

15                     You have got to remember when I was here before  
16 and you asked me about all these people, most of them I, you  
17 know, I knew the names or didn't know the names or what. So  
18 after I left here I went home to the corporate office, and  
19 looked up these people to see who they were, or what they  
20 were, or whatever.

21          Q     Now, we talked about Chip Ramsey.

22                     What was his title again?

23          A     Well, he had various titles. There, again, Chip  
24 was a person who loved titles, business cards. He had  
25 business cards printed with numerous different titles.

1           He originally was an announcer on WBOW, which is  
2   the AM station in Terre Haute. And he did an air shift and  
3   he did a sports show. And then he was not a very good  
4   announcer, and that's why -

5           Q     I didn't ask if -- could we please just answer the  
6   question?

7           My question is what is his title. I didn't ask if  
8   he was good announcer or a bad announcer.

9           MS. SADOWSKY: Your Honor, the tone doesn't have  
10   to be as aggressive.

11          THE WITNESS: He was an announcer. He was a  
12   program director, and he was a promotions manager.

13          MR. ZAUNER: Thank you.

14          BY MR. ZAUNER:

15          Q     In all of these positions he was involved with the  
16   station's programming; is that correct?

17          A     That's correct.

18          Q     At some point you testified you directed him to be  
19   terminated. You directed that he be terminated; is that  
20   correct?

21          A     Yes. Yes.

22          Q     Did you discuss this with Mike Rice before you  
23   gave that order?

24          A     No.

25          Q     Was Mike Rice aware that you were going to

1 terminate -- order the termination of Chip Ramsey?

2 A Not that I recall.

3 Q You indicated, in connection with your testimony  
4 concerning Mr. Holler, that Mr. Holler had family at the  
5 station, and you also indicated that you had family working  
6 for the station too; is that correct?

7 A That's correct.

8 Q And is it not correct that you have a daughter,  
9 Mary Woolsey, working at the stations?

10 A That's correct.

11 Q And what is her title?

12 A She is now the general manager of KBMX.

13 Q And that's the Lake of the Ozark station?

14 A That's correct.

15 Q And you have a son, Robert Cox?

16 A Right.

17 Q And what his present position?

18 A His present position is sales manager of the  
19 stations in Terre Haute.

20 Q And your husband has a company, of which you have  
21 a part interest in, which does business with the stations;  
22 is that not correct?

23 A That is correct.

24 Q So you, your husband and your two children are all  
25 making money from the operation of these stations; is that

1 not correct?

2 A That's correct.

3 I might add, all four of us also have other  
4 sources of income.

5 Q You testified about Ben Jacobs, the program  
6 director at Terre Haute stations. And you said that Mike  
7 Rice never instructed that Ben Jacobs be fired.

8 A Not to me.

9 Q You don't know what he may have said to anyone  
10 else of course.

11 A No.

12 Q Is that correct?

13 A Or what anyone else may have said he said, I don't  
14 know.

15 I might make the comment that if he knew -- oh,  
16 I'm sorry.

17 JUDGE STEINBERG: There is no pending question.

18 THE WITNESS: Oh, okay.

19 JUDGE STEINBERG: You are better off not  
20 volunteering anything, lieutenants in the army.

21 BY MR. ZAUNER:

22 Q In connection with the hiring of John Rhea, were  
23 you looking at other individuals besides John Rhea for the  
24 position?

25 A Yes, I was.

1 Q How many other individuals were you looking for?  
2 Looking at? I'm sorry.

3 A Oh, I don't remember in that particular time  
4 without going back and looking at the EEO report. Received  
5 numerous applications. Several of them were individuals  
6 either that, (a) were just not affordable; or they did not  
7 want to be -- a lot of people didn't want to live in Terre  
8 Haute, Indiana.

9 Q Let me ask you this.  
10 Did you have telephone conversations with a number  
11 of these individuals?

12 A Yes, I did. Yes, I did.

13 Q Did you discuss the position with a number of  
14 these individuals?

15 A Yes, I did.

16 Q And these conversations that you had with these  
17 individuals, they would have occurred approximately five  
18 years ago; is that not correct?

19 A Let's see, 1991.

20 Q 1991.

21 A Yes. Uh-huh.

22 Q Do you remember how many individuals you  
23 interviewed by telephone before --

24 A No, not without looking at the EEO record, I  
25 wouldn't. No.